

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ANDREI SINIOUKOV, Individually and on)	
Behalf of All Others Similarly Situated,)	
)	
<i>Plaintiff,</i>)	
v.)	No. 1:11cv447
)	(LO/TRJ)
SRA INTERNATIONAL, INC., <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	

**DEFENDANT SRA INTERNATIONAL, INC.’S
EMERGENCY MOTION TO CONTINUE HEARING DATE**

Pursuant to Local Civil Rule 7(G) & (I), defendant SRA International, Inc. (“SRA”) and certain individual defendants,¹ moves the Court to enter an order continuing the hearing date on plaintiff’s pending “emergency” motion for leave to conduct expedited discovery and to set a briefing schedule for plaintiff’s (as yet unfiled) motion for a preliminary injunction (Dkt. ## 2-4 & 6). The hearing date unilaterally set by plaintiff, May 6, 2011, is less than 14 days after the motion was filed, and plaintiffs obtained neither defendants’ consent nor a court order setting a shorter notice period. *See* FED.R.CIV.P. 6(c)(1)(C). Plaintiff’s short-noticing of the motion thus violates the rules, is unfair to defendants (who have just been served), and is unwarranted in any event because “good cause” for short-noticing cannot be shown under the facts and circumstances of this action. Defendant SRA respectfully requests that the hearing be moved to Friday, May 13, 2011, the Court’s next regular motions day. The grounds and reasons for

¹ This motion is filed on behalf of defendants SRA International, Inc., John W. Barter, Larry R. Ellis, Miles R. Gilburne, W. Robert Grafton, William T. Keegan, Michael R. Klein, Dr. Stanton D. Sloane, and Dr. Gail R. Wilensky. Defendants Dr. Ernst Volgenau, Providence Equity Partners LLC, Sterling Parent Inc., and Sterling Merger Inc. also support this motion.

granting a continuance are stated with particularity in the accompanying brief. A good faith effort to resolve this scheduling dispute without court intervention was not successful.

SRA SEEKS TO BE HEARD BY TELEPHONIC HEARING AS SOON AS POSSIBLE.

Dated: May 2, 2011

Respectfully submitted,

/s/ Craig C. Reilly

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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of May 2011, a true and correct copy of the foregoing pleading or paper was served using the Court's CM/ECF system, with electronic notification of such filing to the following counsel of record or by email (*):

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